

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KELTON SALOWITZ,

Defendant.

**INDICTMENT**

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The Grand Jury charges:

**COUNT 1**

(Sexual Exploitation of a Child)

Between on or about January 24, 2023, and June 28, 2023, in Mackinac County, in the Northern Division of the Western District of Michigan, and elsewhere, the defendant,

KELTON SALOWITZ,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, for the purpose of producing visual depictions and live visual depictions of such conduct, having reason to know that such visual depictions would be transmitted using a means and facility of interstate commerce. Such visual depictions were produced and transmitted by materials that had been shipped and transported in interstate and foreign commerce and were actually transmitted using a means and facility of interstate commerce.

Specifically, the defendant employed, used, persuaded, induced, enticed, and coerced Minor 1, who was approximately 12 years old, to engage in sexually explicit

conduct, including masturbation and the lascivious exhibition of her genitals and pubic area.

The defendant had reason to know the visual depictions of Minor 1 engaging in sexually explicit conduct would be transmitted over the internet and a cellular communications network, including through the social networking applications SnapChat and Discord.

The visual depictions of Minor 1 engaging in sexually explicit conduct were produced and transmitted by materials that had been shipped and transported in interstate and foreign commerce, including a Samsung Galaxy smartphone.

The visual depictions of Minor 1 engaging in sexually explicit conduct were actually transmitted using a means and facility of interstate commerce, specifically over the internet, a cellular communications network, and through the social networking applications SnapChat and Discord.

18 U.S.C. § 2251(a) and (e)

**COUNT 2**

(Coercion and Enticement of a Child)

Between on or about January 24, 2023, and June 28, 2023, in Mackinac County, in the Northern Division of the Western District of Michigan, and elsewhere, the defendant,

KELTON SALOWITZ,

used facilities and means of interstate and foreign commerce to communicate with an individual in order to knowingly persuade, induce, entice, and coerce an individual who was under the age of 18 years to engage in sexual activity for which any person could be charged with a criminal offense.

Specifically, the defendant used the internet, a cellular communications network, and the social networking applications Discord and SnapChat to persuade, induce, entice, and coerce Minor 1, a female whom the defendant knew to be under 18 years of age, to engage in sexually explicit conduct for the purpose of creating visual depictions of that conduct, and having reason to know that the visual depictions would be transmitted using a means and facility of interstate and foreign commerce, for which KELTON SALOWITZ could be charged with Sexual Exploitation of a Minor, in violation of 18 U.S.C. § 2251(a).

18 U.S.C. § 2422(b)

**COUNT 3**

(Coercion and Enticement of a Child)

Between on or about January 24, 2023, and June 28, 2023, in Mackinac County, in the Northern Division of the Western District of Michigan, and elsewhere, the defendant,

KELTON SALOWITZ,

used facilities and means of interstate and foreign commerce to communicate with an individual in order to knowingly persuade, induce, entice, and coerce an individual who was under the age of 18 years to engage in sexual activity for which any person could be charged with a criminal offense.

Specifically, the defendant used the internet, a cellular communications network, and the smartphone application Discord to persuade, induce, entice, and coerce Minor 2, a female whom the defendant knew to be under 18 years of age, to engage in sexually explicit conduct for the purpose of creating visual depictions of that conduct, and having reason to know that the visual depictions would be transmitted using a means and facility of interstate and foreign commerce, for which KELTON SALOWITZ could be charged with Sexual Exploitation of a Minor, in violation of 18 U.S.C. § 2251(a).

18 U.S.C. § 2422(b)

**COUNT 4**

(Possession of Child Pornography Involving Prepubescent Minors)

On or about June 27, 2023, in Mackinac County, in the Northern Division of the Western District of Michigan, the defendant,

KELTON SALOWITZ,

knowingly possessed images of child pornography that involved prepubescent minors, including, but not limited to, the images and videos listed below:

1. 1\_4956417647135687495
2. 1\_4956417647135687500
3. 1\_4958669446949373230
4. 1\_4958669446949373231
5. 1\_4958669446949373233

Such images were produced using materials which had been shipped and transported in interstate and foreign commerce, including, but not limited to, a Samsung Galaxy smartphone.

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

18 U.S.C. § 2256(8)(A)

**FORFEITURE ALLEGATION**

(Sexual Exploitation of a Child)

(Possession of Child Pornography Involving Prepubescent Minors)

The allegations contained in Counts 1 and 4 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of the offense(s) in violation of 18 U.S.C. §§ 2251 and/or 2252A, the defendant,

KELTON SALOWITZ,

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. § 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense(s) or any property traceable to such property. The property to be forfeited, as to all counts, includes, but is not limited to: a Samsung Galaxy S21 5G Smartphone, Model SM-6998U1, with serial number 276508541.

18 U.S.C. § 2253

28 U.S.C. § 2461(c)

18 U.S.C. § 2251

**FORFEITURE ALLEGATION**  
(Coercion and Enticement of a Child)

The allegations contained in Counts 2 and 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428.

Pursuant to 18 U.S.C. § 2428, upon conviction of the offense(s) in violation of 18 U.S.C. § 2422(b), the defendant,

KELTON SALOWITZ,

shall forfeit to the United States of America any property, real or personal, constituting, or traceable to gross profits or other proceeds obtained from the offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense or any property traceable to such property. The property to be forfeited, includes, but is not limited to, the following: a Samsung Galaxy S21 5G Smartphone, Model SM-6998U1, with serial number 276508541.

18 U.S.C. § 2428  
28 U.S.C. § 2461(c)  
18 U.S.C. § 2422

A TRUE BILL

[ /s/ Redacted ]

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GRAND JURY FOREPERSON

MARK A. TOTTEN  
United States Attorney



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AUSTIN J. HAKES  
Assistant United States Attorney